

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	DOCKET NO. 21-cr-10174
	)	
RYAN OUELLETTE	)	
and	)	
JACOB MOSKO	)	
	)	

**JOINT MOTION TO CONTINUE TRIAL DATE (Assented to)**

Defendant Ryan Ouellette (“Ouellette”) and Defendant Jacob Mosko (“Mosko”) jointly request that the Court continue the trial date in this case from April 26, 2022, for sixty days, i.e., June 27, 2022, and that the final pretrial conference, currently scheduled for March 29, 2022, be rescheduled accordingly.

As grounds for this motion, Defendant Ouellette states that such additional time is required in order for counsel to explore potential resolution of the case short of trial (both Defendant’s counsel and counsel for the government have been actively engaged in negotiations and have requested the involvement of Probation, without a formal request for a pre-plea PSR, in understanding Defendant’s complicated sentencing guidelines). During these negotiations for a potential resolution, neither Defendant, nor the government, believes that final preparations for trial at this time would serve the interests of judicial economy or the interests of justice.

Defendant Mosko also believes that a further continuance would serve the interests justice to explore potential resolution of his case. Mosko’s circumstances dramatically changed on February 3, 2022, when he was arrested and subsequently detained for having violated his conditions of release, which included drug treatment.

The Government has been consulted and assents to this motion.

DEFENDANT OUELLETTE

By his attorney

/s/ John F. Palmer

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DEFENDANT MOSKO

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#### CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered parties on March 25, 2022.

/s/John F. Palmer